

**BOIES SCHILLER FLEXNER LLP**

David Boies (*pro hac vice*)  
333 Main Street  
Armonk, NY 10504  
(914) 749-8200  
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)  
Joshua M. Stein (SBN 298856)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)  
David L. Simons (*pro hac vice*)  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
jischiller@bsfllp.com  
dsimons@bsfllp.com

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class. (additional counsel included below)*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE: REPLY IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
LEAVE TO AMEND**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Reply in Support of Plaintiffs’ Motion for Leave to File a Third Amended Consolidated Complaint (the “Reply”). ECF No. 300. The Reply Brief contains, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc. (“Meta”), has designated as “Confidential” or “Highly Confidential - Attorneys Eyes Only,” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”). Plaintiffs are also filing seven exhibits in support of the Reply under seal because they are either designated, or refer to material that is designated, as “Confidential” or “Attorneys’ Eyes Only.”

Accordingly, Plaintiffs have filed a public version of the Reply to the docket via ECF, redacting references to such extracted information or summaries. Plaintiffs have also filed under seal an unredacted, highlighted version. Plaintiffs have also filed “slipsheet” versions of the sealed exhibits in support of the Reply via ECF.

Dated: December 18, 2024

By: /s/ Joshua M. Stein  
Joshua M. Stein

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

Elizabeth J. Cabraser (State Bar No. 083151)  
Daniel M. Hutchinson (State Bar No. 239458)  
Reilly T. Stoler (State Bar No. 310761)  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
(415) 956-1000  
ecabraser@lchb.com  
dhutchinson@lchb.com  
rstoler@lchb.com

Rachel Geman (*pro hac vice*)  
250 Hudson Street, 8th Floor  
New York, New York 10013-1413  
(212) 355-9500  
rgeman@lchb.com

**JOSEPH SAVERI LAW FIRM LLP**

Joseph R. Saveri (SBN 130064)  
Cadio Zirpoli (SBN 179108)  
Christopher K.L. Young (SBN 318371)  
Holden Benon (SBN 325847)  
Aaron Cera (SBN 351163)  
Margaux Poueymirou (SBN 356000)  
601 California Street, Suite 1505  
San Francisco, California 94108  
(415) 500-6800  
jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com  
mpoueymirou@saverilawfirm.com

**CAFFERTY CLOBES MERIWETHER &  
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)  
135 S. LaSalle Street, Suite 3210  
Chicago, IL 60603  
(312) 782-4880  
bclobes@caffertyclobes.com

**DICELLO LEVITT LLP**

**BOIES SCHILLER FLEXNER LLP**

David Boies (*pro hac vice*)  
333 Main Street  
Armonk, NY 10504  
(914) 749-8200  
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)  
Joshua M. Stein (SBN 298856)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)  
David L. Simons (*pro hac vice*)  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
jischiller@bsfllp.com  
dsimons@bsfllp.com

*Interim Lead Counsel for Individual and  
Representative Plaintiffs and the Proposed  
Class*

Amy Keller (*pro hac vice*)  
Nada Djordjevic (*pro hac vice*)  
James Ulwick (*pro hac vice*)  
10 North Dearborn Street, Sixth Floor  
Chicago, Illinois 60602  
(312) 214-7900  
akeller@dicellolevitt.com  
ndjordjevic@dicellolevitt.com  
julwick@dicellolevitt.com

David Straite (*pro hac vice*)  
485 Lexington Avenue, Suite 1001  
New York, New York 10017  
(646) 933-1000  
dsraite@dicellolevitt.com

Matthew Butterick (SBN 250953)  
1920 Hillhurst Avenue, #406  
Los Angeles, CA 90027  
(323) 968-2632  
mb@buttericklaw.com

**COWAN DEBAETS ABRAMS &  
SHEPPARD LLP**

Scott J. Sholder (*pro hac vice*)  
CeCe M. Cole  
60 Broad Street, 30th Floor  
New York, NY 10004  
(212) 974-7474  
ssholder@cdas.com  
ccole@cdas.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class.*